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Service by Facsimile
 is Not Accepted

Earl S. Jones, Jr. (1924-2004)

PLEASE REPLY TO
 Saugerties Office

RECORDED
SEARCHED
INDEXED: *6/3/08* May 30, 2008

Gonzalez v. Silver, M.D., et al.
 1:07-cv-02898-CM-MHD
 Our File No. 125.25442

Honorable Michael H. Dolinger
 U.S. Magistrate
 Southern District Court
 United States Courthouse
 500 Pearl Street, Room 1670
 New York, New York 10007-1312

Dear Judge Dolinger:

As you know, discovery must be completed, in the above entitled matter, by June 30, 2008 pursuant to the scheduling order herein. As you are also aware, several defendants have recently appeared in the case and one of my clients, Dr. Samuel Lamb, has not yet been served. Plaintiff's examination before trial is scheduled for June 20, 2008 at Sing Sing Correctional Facility. The scheduling order also provides that expert disclosure must be served by July 14, 2008 and dispositive motions must be served no later than August 15, 2008.

In light of the foregoing, I am respectfully requesting that the deadlines for discovery, expert disclosure and dispositive motions all be extended by three (3) months to allow us sufficient time to obtain experts, complete paper discovery, obtain the plaintiff's complete medical file, and prepare dispositive motions after all the defendants have been served and the plaintiff's deposition has been completed. If this meets your approval, please order same by signing where indicated below at your earliest convenience.

ENDORSED ORDER
 The current scheduled deadlines are
 advanced 30 days. Counsel who are
 taking plaintiff's deposition are
 reminded that they are responsible
 for arranging a Spanish-language
 interpreter since plaintiff reports that
 she is not fluent in English.

6/3/08

McCourt

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WILFREDO GONZALEZ,

Plaintiff,

**CERTIFICATE OF
SERVICE**

-against-

DR. LESTER N. WRIGHT, STEVEN SILVER, MD,
SAMUEL LAM, MD, MICHELLE PUTNAM, MD,
JONATHAN SMITH, MD, AUGUSTINE
MOSCATELLO, MD, WLADYSLAW SIDOROWICZ, MD,
S.J. LILLEY, RN/MHSA, HERBERT GOULDING, MD,
R. BLAIR, RN/MHSA,

1:07-cv-02898-CM-MIID

Defendants.

I hereby certify that on May 30, 2008, I have mailed by the United States Postal Service the foregoing proposed letter order to the following non-ECF Participants:

PERSONAL AND CONFIDENTIAL

WILFREDO GONZALEZ, 83A 5986
Woodbourne Correctional Facility,
99 Prison Road, POB 1000
Woodbourne, NY 12788-1000

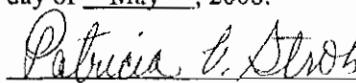
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Monica R. Pole

Sworn to before me this 30th
day of May, 2008.



Patricia V. Stroh

NOTARY PUBLIC - STATE OF NEW YORK

PATRICIA V. STROH
Notary Public, State of New York
No. 01ST4813879
Qualified in Ulster County
Commission Expires February 28, 2011

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